

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARY HALL-RAYFORD, KAREN
BELTZ, KAREN MOURADJIAN, and
CYNTHIA FEDERLE,

Plaintiffs,

v.

MONIQUE OWENS, in her individual
capacity and official capacity as Mayor
of Eastpointe, and CITY OF
EASTPOINTE, a political subdivision
of the State of Michigan,

Defendants.

Case Number: _____

Hon. _____

**PLAINTIFFS' *EX PARTE* MOTION
FOR LEAVE TO FILE EXHIBITS
USING THE MEDIA FILE UPLOAD**

Conor T. Fitzpatrick (P78981)
Harrison M. Rosenthal (Pa. Bar No. 332452)
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Counsel for Plaintiffs

Plaintiffs Mary Hall-Rayford, Karen Beltz, Karen Mouradjian, and Cindy Federle ("Plaintiffs"), through their counsel the Foundation for Individual Rights and Expression, move under E.D. Mich. ECF Policies and Procedures Rule 19(c) for leave to file five exhibits via the electronic portal "Media File Upload" in CM/ECF.

These videos—exhibits D, F, G, H, and I to Plaintiffs’ Verified Complaint—cannot be converted to PDF because they are video files.

Plaintiffs respectfully request the Court grant their Motion.

Dated: November 9, 2022 Respectfully submitted,

By: /s/ Conor T. Fitzpatrick
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing upon all ECF filing Participants. I further certify that I emailed a copy of the foregoing to Eastpointe's City Attorney and dispatched a process server to personally serve the same on each Defendant.

By: /s/Conor T. Fitzpatrick